## REMARKS:

#### **Status**

Claims 1 to 12, 15 to 18, 21 to 24, 26, 27 and 29 are pending. Claims 1, 7, 15, 21, 24, 26, 27 and 29 have been amended, and claims 13, 14, 19, 20, 25 and 28 have been cancelled. Claims 1, 7, 24 and 27 are the independent claims. Reconsideration and further examination are respectfully requested.

# Section 112 Rejection

Claim 7 was rejected under 35 U.S.C. § 112, ¶2, for insufficient antecedence for the limitation "each said simulated thread." Applicant has amended this limitation to read "each of said simulated dynamically-allocated threads," which finds clear antecedence in the claim.

Accordingly, withdrawal is respectfully requested of the § 112 rejection of claim 7.

### Section 102 Rejections

Claims 1 to 29 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,835,763 (Klein).

Claims 1 to 6, 12, and 15 to 17: Claim 1 is the independent one of these claims and is reproduced below as amended:

1. A method including simulating a plurality of dynamically-allocated threads using a single statically-allocated thread; and

maintaining state information used by each dynamically-allocated thread in variables maintained by said statically-allocated thread;

wherein said statically-allocated thread simulates said plurality of dynamically-allocated threads by using a scheduler to call thread blocks for said plurality of dynamically-allocated threads; and

wherein said thread blocks are stored in a linked list maintained by said statically-allocated thread.

The applied reference, namely Klein, is not seen by Applicant to disclose or to suggest the foregoing features of claim 1, at least with respect to the feature that "said thread blocks are stored in a linked list maintained by said statically-allocated thread."

This feature was previously recited by claim 14. In the rejection of that claim, the Office Action cited col. 7, lines 1 to 25, of Klein for teaching this feature. However, Applicant sees no mention whatsoever in the cited text of storing thread blocks in a linked list.

The closest that the cited text appears to Applicant to come to the claimed linked list is the following: "The primary difference between the threads in thread pool 40 and other non-threaded computer batch jobs is that although such batch jobs are typically totally independent of each other, the threads in thread pool 40 are tied together to be made aware of each other." However, this text does not provide any indication how the threads are stored. No mention is made of storing the threads in a linked list.

Neither the remaining cited text nor the rest of Klein appears to Applicant to teach use of a linked list to store thread blocks. In fact, the term "linked list" does not even appear in Klein.

For at least the foregoing reasons, reconsideration and withdrawal are respectfully requested of the rejection of claim 1 and its dependent claims, as is allowance of those claims.

Claims 7 to 11, 18, and 21 to 23: Claim 7 is the independent one of these claims and is reproduced below as amended:

7. Apparatus including a file server system having a single statically-allocated thread including a plurality of simulated dynamically-allocated threads, said statically-allocated thread maintaining variables that maintain state information used by each of said simulated dynamically-allocated threads;

wherein said statically-allocated thread simulates said plurality of dynamically-allocated threads by using a scheduler to call thread blocks for said plurality of dynamically-allocated threads; and

wherein said thread blocks are stored in a linked list maintained by said statically-allocated thread.

Klein is not seen by Applicant to disclose or to suggest the foregoing features of claim 7, at least with respect to the feature that "said thread blocks are stored in a linked list maintained by said statically-allocated thread." Accordingly, reconsideration and withdrawal are respectfully requested of the § 102(e) rejection of claim 7 and its dependent claims. Allowance of these claims also is requested.

<u>Claims 24 and 26</u>: Claim 24 is the independent one of these claims and is reproduced below as amended:

24. A method of implementing a plurality of simulated dynamically-allocated threads using a single statically-allocated thread, comprising:

using a scheduler implemented by said single statically-allocated thread to call thread blocks for said plurality of simulated dynamically-allocated threads; and

maintaining state information used by each of said plurality of simulated dynamically-allocated threads in variables maintained by said statically-allocated thread;

wherein said thread blocks are stored in a linked list maintained by said statically-allocated thread.

Klein is not seen by Applicant to disclose or to suggest the foregoing features of claim 24, at least with respect to the feature that "said thread blocks are stored in a linked list maintained by said statically-allocated thread." Accordingly, reconsideration and withdrawal are respectfully requested of the § 102(e) rejection of claim 24 and its dependent claim 26.

Allowance of these claims also is requested.

<u>Claims 27 and 29</u>: Claim 27 is the independent one of these claims and is reproduced below as amended:

27. Apparatus including a server that implements a plurality of simulated dynamically-allocated threads using a single statically-allocated thread, comprising:

a processor that executes a scheduler implemented by said single statically-allocated thread to call thread blocks for said plurality of simulated dynamically-allocated threads; and

memory that stores state information used by each of said plurality of simulated dynamically-allocated threads in variables maintained by said statically-allocated thread;

wherein said thread blocks are stored in a linked list maintained in said memory by said statically-allocated thread.

Klein is not seen by Applicant to disclose or to suggest the foregoing features of claim 27, at least with respect to "said thread blocks are stored in a linked list maintained in said memory by said statically-allocated thread." Accordingly, reconsideration and withdrawal are respectfully requested of the § 102(e) rejection of claim 27 and its dependent claim 29. Allowance of these claims also is requested.

# Closing

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicant's undersigned attorney can be reached at (614) 486-3585. All correspondence should continue to be directed to the address indicated below.

Respectfully submitted,

Dated: August 8, 2004

Dane C. Butzer Reg. No. 43,521

Swernofsky Law Group PC P.O. Box 390013 Mountain View, CA 94039-0013 (650) 947-0700